

[COUNSEL LISTED ON FOLLOWING PAGE]

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

AMANDA FRLEKIN, *et al.*,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Lead Case No. C 13-03451 WHA  
Consolidated Case No. 13-CV-04727-WHA

**DECLARATION OF LONNIE C.  
BLANCHARD III IN SUPPORT OF  
MOTION FOR LEAVE TO FILE A  
SECOND AMENDED/CONSOLIDATED  
COMPLAINT PURSUANT TO COURT  
ORDER DATED DECEMBER 23, 2014**

TAYLOR KALIN,

Plaintiff,

v.

APPLE INC., a California Corporation

Defendant.

Judge: Hon. William H. Alsup  
Courtroom: 8

Date: February 19, 2015  
Time: 8:00 am  
Judge: Hon. William H. Alsup  
Place: Courtroom 8

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25 Attorneys for Plaintiff TAYLOR KALIN  
26  
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I, Lonnie C Blanchard III, declare as follows:

1. I am one of the attorneys for the plaintiffs in this class action case. I have personal knowledge of the matters set forth in this declaration and, if called as a witness, could competently testify to their truth.
2. A clean copy of the Proposed Consolidated Complaint is attached as ***Exhibit A***.
3. A redline of the Proposed Consolidated Complaint against the Frlekin First Amended Complaint is attached as ***Exhibit B***.
4. A redline/comparison of the Proposed Consolidated Complaint against the Kalin First Amended Complaint is attached as ***Exhibit C***.
5. A copy of the California Supreme Court's opinion in *Mendiola vs. CPS Security Systems, Inc.*, [citation not yet available] (January 8, 2015) is attached as ***Exhibit D***.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Los Angeles, California on the date set forth below.

Dated: January 9, 2015

/s/ Lonnie C. Blanchard III

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Lonnie C Blanchard III